

EPA COMMENTS - OU 8 FINAL WORKPLAN

1. The final work plan for OU8 has been revised and improved according to EPA and CDH recommendations. The plan now appears adequate to direct the RI work proposed for OU8, assuming that all proposed standard operating procedures (SOPs) and technical memoranda are adequate.
2. There is still concern regarding the HHRA. Generally, the HHRA for OU8 should reflect the results of ongoing discussions regarding the HHRA for OU1. Specifically, the exposure scenario should consider a future on-site residential setting. In addition, the criteria for determining contaminants of concern should correspond with those endorsed by EPA in the document, Risk Assessment Guidance for Superfund (EPA, 1989). Note that the Technical Memoranda which will decide these questions for OU 8 should be accepted by EPA and CDH before proceeding with the process.
3. As mentioned in the industrial area (IA) interim measures/interim remedial action plan (IM/IRA) (DOE, 1992), the time and money required to complete the RI activities within the IA could be greatly reduced by changing IA security requirements. The transition of several buildings to the environmental restoration program, may allow such changes in security procedures for these areas. The impact of this on OU8 activities should be discussed as part of a new section integrating D&D activities with environmental restoration.
4. Waiting for D&D plans to be fully developed would delay RI activities unnecessarily. Most of the individual hazardous substance sites (IHSS) identified in the OU8 work plan are related to small spills or releases that affect surface soils. The planned Stage I and II activities, which concentrate on surface soils, will enhance the characterization of contamination at these sites. With the exception of the soil gas surveys, these activities are also non-intrusive and minimize the potential for damage to underground lines. Stage I and Stage II activities should progress as scheduled while D&D plans are finalized.
5. The planned soil borings for the Stage 3 investigation could be deferred until building operations in proximity to the IHSSs have been moved to a safer configuration. The potential for damage to underground lines currently is a safety hazard. Alternatively, more detailed information on the locations of underground pipes and cables could be acquired using geophysical techniques.
6. Following the Stage 3 investigation, ground-water contamination at OU8, and elsewhere in the IA may need to be addressed on an area wide basis to identify the sources and

extent of the contamination. Complete characterization of ground-water contamination may not be achieved until under building contamination (UBC) is assessed. Therefore, evaluation of UBC should remain an important goal during the transition process.

7. EPA and CDH have agreed that only OU8 IHSSs will be investigated. The response does not clarify how results from individual IHSSs will be related to known or potential contamination from adjacent IHSSs, potential areas of concern (PACs), or UBC in the area. The RFI/RI work plan should address this issue.

8. Soil sampling beneath concrete or asphalt is now discussed in a subsection of Section 6.4.2.1 on page 6-21. This section does not, however, discuss how the sampling will be conducted. It states that an SOP for this sampling procedure will be submitted prior to field work. Provisions for approval of SOPs before beginning field work should be added to this section or included by reference in other sections of the work plan.

9. DOE contends that Class A carcinogens at or below background levels will not be included in the baseline risk assessment. The flow chart in Figure 8-3 has not been changed to place Class A carcinogens at the top of the chart as requested by EPA. This point must be resolved in accordance with ongoing discussions on OU 1 before the contaminants of concern are identified.

10. It is not clear if the discussion provided on chemical specific benchmarks is consistent with recent presentations on EG&G's "managed approach" to determining what analytical detection levels are required at different stages of the investigation. This should be investigated and any discrepancies resolved.

11. On several occasions, DOE has discussed implementing an "areawide" approach to assessing surface water and sediment contamination in the Industrial Area. If this idea is to be pursued, the OU 8 Workplan should reflect that and indicate how the two efforts fit together, and where the "areawide" efforts will be set out for regulatory review.

12. The schedule included in the Workplan has applied the extension granted on the Workplan to all subsequent milestones. This is incorrect. Subsequent milestones remain as shown in the IAG. The Draft RI Report is due on February 14, 1994, and will remain so unless this date is changed by EPA and CDH.